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*Attorneys for St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd.,
Chris Roth, Natasha Erickson, M.D., and Tracy Jungman, NP*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In re:

AMMON EDWARD BUNDY
Debtor.

Bankruptcy No. 24-23530

Chapter 7

Honorable William T. Thurman

**DECLARATION OF ROBERT A. FAUCHER REGARDING LISA BUNDY'S
RULE 2004 EXAMINATION**

I, Robert A. Faucher, declare and state as follows:

1. I am a partner in the Boise office of the law firm of Holland & Hart LLP and am licensed to practice law in the State of Idaho. I am admitted to this Court *pro hac vice* for this case. Along with my colleagues identified above, I am counsel for St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha D. Erickson, M.D., and Tracy W.

Jungman, NP (collectively, the “St. Luke’s Creditors”). I am familiar with the facts and proceedings in this matter and have personal knowledge of the matters stated in this Declaration.

2. This Court entered an order as Docket No. 29 granting the St. Luke’s Creditors’ motion to take a rule 2004 examination of Lisa Bundy (“Mrs. Bundy”).

3. Attached hereto as **Exhibit A** is a true and complete copy of a notice of personal service with respect to St. Luke’s subpoena upon Lisa Bundy (the “Original Subpoena”). The Original Subpoena, however, mistakenly demanded that Mrs. Bundy appear for her oral examination in Salt Lake City, which is more than 100 miles from Mrs. Bundy’s home. The Original Subpoena was issued in error.

4. Once the undersigned counsel realized his error, he immediately revised the Original Subpoena to change the place of Mrs. Bundy’s oral examination to St. George, Utah. St. George is within 100 miles of Mrs. Bundy’s residence. However, the St. Luke’s Creditors were unsuccessful serving the revised subpoena by means of personal service upon Mrs. Bundy because she was evading and refusing service. Attached hereto as **Exhibit B** is a true and complete copy of the notice of non-service.

5. The St. Luke’s Creditors served the corrected subpoena on Mrs. Bundy on or about October 2, 2024. That October 2 service is summarized as follows:

- (a) U.S. Postal Service – Priority Mail, Tracking No. 9114 9022 0078 9336 5331 77 addressed to Lisa Bundy, P.O. Box 1062, Cedar City, UT 84721.
- (b) UPS Overnight, Tracking No. 1Z E79 W29 01 9011 9706, addressed to Lisa Bundy, 896 E 400 S, New Harmony, UT 84757.

(c) By E-Mail, addressed to Lisa Bundy, at bundlm.lb@gmail.com and bundylmlb@msn.com.

6. Attached hereto as **Exhibit C** is a true and correct copy of the USPS tracking document reflecting that the package was mailed to the Bundys' post office box.

7. Attached hereto as **Exhibit D** is a true and complete copy of the UPS tracking document. The tracking shows that the package was successfully received at its destination (the Bundys' residence).

8. Attached hereto as **Exhibit E** is a true and correct copy of the e-mail transmission to Mrs. Bundy. I did not receive a bounce-back indicating that my e-mail transmission was unsuccessful.

9. Attached hereto as **Exhibit F** is a true and correct copy of the follow-up email correspondence I sent to Mrs. Bundy, reminding Mrs. Bundy of her obligations under the subpoena.

10. The subpoena obligated Mrs. Bundy to produce documents on October 17 and to appear for an oral examination in St. George on October 21.

11. Mrs. Bundy responded to service of the Original Subpoena by making a post regarding it on her Facebook page. A true and complete copy of the post is attached hereto as **Exhibit G**.

12. Mrs. Bundy never responded directly to me by any means.

13. Because Mrs. Bundy had not informed me that she would not show up for her scheduled oral examination on October 21 in St. George, I travelled from Boise to St. George for the examination. I prepared for the examination in advance of the examination. A court reporter,

a videographer and a court reporter were all present for the oral examination on Monday, October 21, at 9:00 a.m. Mrs. Bundy did not show.

14. To date, Mrs. Bundy has not produced any documents in response to the St. Luke's Creditors' subpoenas.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 7th day of November, 2024.

/s/ Robert A. Faucher

Robert A. Faucher

CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2024, I electronically filed the foregoing with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF user.

Matthew James Burne matthew.burne@usdoj.gov; james.gee@usdoj.gov;
lindsey.huston@usdoj.gov; rinehart.peshell@usdoj.gov;
rachell.e.d.hughes@usdoj.gov; brittany.deweitt@usdoj.gov

George B. Hoffmann ghofmann@ck.law; mparks@ck.law

David W. Newman david.w.newman@usdoj.gov; james.gee@usdoj.gov;
lindsey.huston@usdoj.gov; rinehart.peshell@usdoj.gov;
rachell.e.d.hughes@usdoj.gov; brittany.deweitt@usdoj.gov

Mark C. Rose trustee@mbt-law.com; UT32@ecfbis.com

U.S. Trustee USTPRegion19.SK.ECF@usdoj.gov

By U.S. First Class Mail with postage pre-paid:

Ammon Edward Bundy
P.O. Box 1062
Cedar City, UT 84720

Ammon Edward Bundy
896 E 400 S
New Harmony, UT 84757

/HOLLAND & HART LLP

/s/ Erik F. Stidham

Erik F. Stidham (Admitted Pro Hac Vice)
Robert A. Faucher (Admitted Pro Hac Vice)

HOLLAND & HART LLP
As local counsel

/s/ Engels Tejeda

Darren G. Reid (#11163)
Engels Tejeda (#11427)
Benjamin D. Passey (#19234)

Attorneys for St. Luke's Health System, Ltd.,
St. Luke's Regional Medical Center, Ltd.,
Chris Roth, Natasha Erickson, M.D., and
Tracy Jungman, NP

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PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)*: Lisa Bundy
on *(date)* 09/24/24.

☒ I served the subpoena by delivering a copy to the named person as follows: by delivering to Lisa Bundy after
refusal to accept service at 896 E 400 S, New Harmony UT 84757 at 3:10 pm
on *(date)* 09/24/2024; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ 251.26.

My fees are \$ _____ for travel and \$ 115.00 for services, for a total of \$ 115.00.

I declare under penalty of perjury that this information is true and correct.

Date: 09/26/2024



Server's signature

Randy Earl, G102068

Printed name and title

Beehive Attorney Service
107 S 1470 E, Suite 201
St George, UT 84790

Server's address

Additional information concerning attempted service, etc.:

SUBPOENA FOR RULE 2004 EXAMINATION; \$251.26; FRCP 45; EXHIBIT A

B2540 (Form 2540 – Subpoena for Rule 2004 Examination) (12/15)

UNITED STATES BANKRUPTCY COURT

District of Utah

In re Ammon Edward Bundy
Debtor

Case No. 24-23530

Chapter 7

SUBPOENA FOR RULE 2004 EXAMINATION

To: Lisa Bundy

(Name of person to whom the subpoena is directed)

☒ **Testimony:** **YOU ARE COMMANDED** to appear at the time, date, and place set forth below to testify at an examination under Rule 2004, Federal Rules of Bankruptcy Procedure. A copy of the court order authorizing the examination is attached.

PLACE

Holland & Hart LLP
222 S. Main Street, Suite 2200
Salt Lake City, UT 84101

DATE AND TIME

October 15, 2024
9:00 a.m. MDT

The examination will be recorded by this method: _____
produce

☒ **Production:** You, or your representatives, must also ~~bring with you to the examination~~ bring with you to the examination the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

See Exhibits A, A.1 & A.2. Your production is due by October 10, 2024 at Holland & Hart LLP, 222 S. Main St., Ste. 2200 Salt Lake City, UT 84101.


The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: September 24, 2024

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk



Attorney's signature

The name, address, email address, and telephone number of the attorney representing (name of party)
St. Luke's Health System, Ltd., who issues or requests this subpoena, are:

Robert A. Faucher, Holland & Hart LLP, 800 W. Main St., Ste. 1750, Boise, ID 83702 (208) 342-5000
rfaucher@hollandhart.com, Attorneys for St. Luke's Health System, Ltd.

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)*: _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____
_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true and correct.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information concerning attempted service, etc.:

Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)
(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)

(c) Place of compliance.

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

(A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises, at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

...

(g) *Contempt.* The court for the district where compliance is required — and also, after a motion is transferred, the issuing court — may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT A

To Subpoena for Rule 2004 Examination, issued to Lisa Bundy
In Ammon Edward Bundy, Case No. 24-23530, United States Bankruptcy Court, District of Utah

You are obligated to produce the documents identified below, in accordance with the Definitions set forth below, no later than October 9, 2024. You shall produce copies of those documents at the following location:

Holland & Hart LLP
222 South Main Street
Suite 2200
Salt Lake City, UT 84101

Or, you may deliver the documents to that location and make them available for copying by the parties who issued the subpoena. Or, you may deliver the documents in electronic form to:

efstidham@hollandhart.com and
rfaucher@hollandhart.com

You shall identify, with respect to all of the produced Documents, the paragraph number of the request(s) below to which such Document is responsive.

The parties issuing this Subpoena are already in possession of the Already-Obtained Statements. You need not produce them.

DEFINITIONS

“Abish-husbondi” means Abish-husbondi Inc., a Wyoming corporation now known as Kekoa Grove, Inc.

“Already-Obtained Statements” means those bank account statements and credit union account statements identified at Exhibit A.1 hereto.

“Bankruptcy Case” means *In re Ammon Edward Bundy*, Case No. 24-23530, United States District Court, District of Utah.

“Books” means Documents consisting of books and records of a business enterprise, including without limitation, articles of organization, articles of incorporation, by-laws, meeting minutes, stock transfer ledgers, stock certificates or other evidence of equity ownership, indemnification agreements and shareholders’ agreements.

“Bundys” means You and Ammon Edward Bundy.

“Cash Transfers” means those cash deposits Ammon Bundy made into Abish-husbondi bank accounts or credit union accounts as follows:

Date	Amount
August 14, 2020	\$69,000.00
August 19, 2020	\$26,600.00
December 14, 2020	\$50,000.00
February 26, 2021	\$49,800.00
May 17, 2021	\$40,000.00
August 10, 2021	\$ 9,980.00
August 18, 2021	\$59,800.00
September 17, 2021	\$50,000.00
May 31, 2023	\$14,800.00
October 12, 2023	\$17,500.00

“Chambers Transfer” means a transfer of money in the approximate amount of \$487,167.36 from the law offices of Harris, Preston & Chambers to the MA Account.

“Document” or “Documents” shall mean the original, all copies and drafts of papers and writings and data of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, texts, voice messages, instant messages, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, telegrams, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, lab books, lab notes, lab journals or notebooks, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, deeds, mortgages, deeds of trust, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, trust, releases of claims, charters, certificates, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. “Documents” shall include “Electronically Stored Information” as defined herein. “Documents” shall include all of the foregoing transmitted through, or stored in, without limitation, the Signal messaging service. “Documents” shall mean all of the foregoing Documents in Your custody or control.

“Electronically Stored Information” means information made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Electronically Stored Information shall include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones,

Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

“Estopped Certificate” means that Estopped [sic] Certificate, Release & Waiver attached to this subpoena as Exhibit A.2.

“Financial Account Statements” means Documents, including account statements and correspondence, with respect to any financial accounts, including without limitation bank accounts, credit union accounts, securities accounts, credit card accounts, commodities accounts, retirement accounts, 401(k) accounts, Roth accounts, IRA accounts and investment accounts, including all attachments to such statements (such as copies of checks); provided, however, that the term does not include the Already-Obtained Statements.

“Financial Records” means Documents consisting of Financial Account Statements, financial records and software of a business enterprise, whether or not incorporated, including without limitation account and other ledgers, bookkeeping data, accounting data, QuickBooks, etc.

“Former Residence” means that real property in Gem County, Idaho with a street address of 4615 Harvest Lane, Emmett, ID 83617.

“Idaho Litigation” means that lawsuit styled *St. Luke’s Health System, Ltd., et al. v. Ammon Bundy, et al.*, Case No. CV-01-22-06789, Fourth Judicial District Court, State of Idaho, County of Ada.

“Judgment” means, collectively, the following court filings in the Idaho Litigation: (i) Default Judgment entered August 29, 2023; (ii) Order on Verdict and Default Judgment entered August 29, 2023.

“PRN” means People’s Rights Network, an unincorporated association with which You have been affiliated.

“Schedules” means the schedule of assets, schedule of liabilities and other schedules filed at docket nos. 5 and 19 in the Bankruptcy Case.

“Statements” means Your statement of financial affairs and other statements filed at docket no. 5 in the Bankruptcy Case.

“You” means Lisa Bundy, your agents, attorneys, employees, representatives, investigators, consultants and attorneys, and “Your” is the possessive form of You.

Documents You are Obligated to Produce

1. All Books of You from January 1, 2020-present.
2. All Financial Records of You from January 1, 2020-present.

3. All Financial Account Statements of You from January 1, 2020-present other than the Already-Obtained Statements.
4. All Documents relating to or evidencing assets in your possession or ownership at any date subsequent to January 1, 2020 of a value exceeding \$500, whether those assets consist of financial accounts (e.g., bank accounts, credit union accounts, securities accounts, commodity accounts, insurance accounts, etc.), financial assets, notes, bonds, stock certificates, equity interests, jewelry, motor vehicles, equipment, household goods, cash, claims, real property, or any other kind of asset, whether tangible or intangible. Notwithstanding the foregoing, you need not produce any documents relating to your Former Residence.
5. All Documents relating to or evidencing assets conveyed to You or by You subsequent to January 1, 2020 of a value exceeding \$500, whether those assets consist of financial accounts (e.g., bank accounts, credit union accounts, securities accounts, commodity accounts, insurance accounts, etc.), financial assets, notes, bonds, jewelry, motor vehicles, equipment, household goods, cash, claims, real property, or any other kind of asset, whether tangible or intangible. Notwithstanding the foregoing, you need not produce any documents relating to your Former Residence.
6. Your personal federal tax returns and schedules for the years 2020-present
7. Your personal state tax returns and schedules for the years 2020-present.
8. Your most recently filed federal income tax return.
9. Your most recently filed state income tax return.
10. All tax forms statements issued to you on and after January 1, 2020, such as IRS Form 1099, IRS Form W-2, and IRS Schedule K-1.
11. All Documents pertaining to the Cash Transfers and the transactions that gave rise to them, other than Already-Obtained Statements, including without limitation agreements, receipts, or invoices.
12. All Documents pertaining to any transfers of value of more than \$500 from Bundys to any other person from the period January 1, 2022-present.
13. Documents consisting of any trust agreements pertaining to any trust as to which You are or have been since January 1, 2020, a grantor, trustee, or beneficiary.
14. All Documents evidencing or relating to Your interest in any real property which you now own or have owned since January 1, 2000.
15. All Documents relating to the Estopped Certificate.

16. All Documents relevant to all transactions in which You or Ammon Bundy has engaged to hinder, delay or impair the St. Luke's Parties' efforts to collect on or enforce the Judgment, including without limitation the Chambers Transfer but not including Documents pertaining to the Former Residence.
17. All Documents in Your possession or control relating to (1) websites operated by PRN or associated with PRN's activities, and (2) websites affiliated with St. Luke's Exposed or Stlukesexposed.
18. All Documents exchanged between the Bundys and Jane Valenzuela, an Arizona resident, and all documents pertaining to the transactions between Valenzuela and any the Bundys.
19. All Documents pertaining to any asset in which You have any beneficial interest but in the possession or control or ownership of another person, including without limitation any asset which You believe should be returned to You or Ammon Bundy at some point in the future.
20. All Documents evidencing or pertaining to any property you inherited since January 1, 2020.
21. Any Documents in Your possession evidencing an inaccuracy in the Schedules or the Statements.

EXHIBIT A.1

Already Obtained Statements

CLARITY CREDIT UNION ACCOUNT STATEMENTS			
Account Holder	Account Number	Dates	
Abish-Husbondi	***1572	Aug 31, 2020 - March 31, 2024	
Ammon Bundy – Ammon Bundy for Governor	***2161	May 31, 2021 – Feb 28, 2023	
Bowen Bundy (Lisa Bundy joint holder)	***2128	May 31, 2021 – March 31, 2024	
Dono Custos INC	***1719	Oct 31, 2020 – March 31, 2024	
Farm Inc Bundy	***1571	Aug 31, 2020 - Jan 31, 2023	
Hayden Bundy	***2127	May 31, 2021 - March 31, 2024	
Lisa Bundy	***1616	Sep 30, 2020 – March 31, 2024	

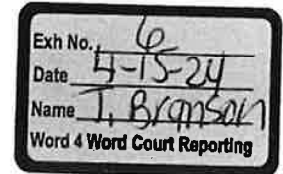
EXHIBIT A.1 TO SUBPOENA - 1

WELLS FARGO BANK ACCOUNT
STATEMENTS

Account Holder	Account Number	Dates
Abish Husbandi Inc	*****4772	Aug 30, 2019 – Dec 31, 2020
Abish Husbandi Inc	*****7284	Aug 31, 2019 - Oct 31, 2020
Abish Husbandi Inc	*****4778	Aug 31, 2019 – Dec 31, 2020
Ammon Bundy	*****4297	Oct 17, 2018 - Jan 16, 2020
Bundy Farm Inc AKA Bundy Melons	*****7835	Feb 29, 2020 – Dec 31, 2020
Halle Bundy	*****2035	Feb 29, 2020
Halle Bundy	*****7147	Feb 28, 2020 - Sep 28, 2020
Lisa Bundy	*****0547	Oct 22, 2018 - Sep 30, 2020
Lisa Bundy	*****9358	Oct 22, 2018 - Sep 30, 2020
Valet Fleet Services, LLC	*****6948	June 30, 2019 – Sep 30, 2023
Valet Fleet Services, LLC	*****6955	Jan 1, 2018 – May 31, 2019

32863387_v1

EXHIBIT A.1 TO SUBPOENA - 2



**ESTOPPED CERTIFICATE,
RELEASE & WAIVER**

Recitals

Global Trading & Investments, Inc., an Idaho corporation ("GT&I") is in possession of certain funds belonging to Ammon E. and Lisa M. Bundy (collectively "Bundy"). GT&I and its principals desire to distribute the funds to Bundy (or to such party or parties as Bundy directs) and upon distributions be released of any further liability with regards to said funds.

Estoppel, Release & Waiver

NOWHEREFORE, for good and valuable consideration, and GT&I's reliance on Bundy's execution of this instrument, the parties to this agreement represent and agree to the following:

A. Waiver of Accounting. Bundy waives any further accounting of the funds. Upon receipt of the signed release GT&I shall cause to be disbursed to Abish-husband, Inc., the sum of \$487,167.36 (\$507,167.36473,000 less \$20,000.00).

B. Full & Complete Distribution. Except for the \$20,000 fee the distribution represents a full and complete satisfaction of Bundy's interest in the funds and GT&I's obligation to Bundy.

C. Release. Bundy releases and forever discharges GT&I, their officers, directors, shareholders, agents, attorneys, accountants and/or other representatives, from all actions, claims and demands whatsoever including but not limited to any claim(s) relating to the Loan Servicing and Stock Investment Arrangements, and any other act, matter, cause, or thing whatsoever arising out of the aforesaid transactions or the administration of such funds received from Bundy. *Bundy understands that they have the right to obtain advice concerning this instrument from independent legal counsel of their choice, at their cost, and represents that they have either done so prior to executing this instrument or have knowingly elected voluntarily to waive any such right at this time.*

D. Estoppel Certificate. Bundy understands and agrees that by executing this instrument that GT&I and its agents are relying on the Bundy's representation in this instrument in making the distribution as directed by Bundy, instead of interpleading the funds into a court to obtain court approval. Bundy understands and agrees that if they sign this instrument, they will be forever estopped from challenging this instrument in any fashion

E. Indemnification. Bundy agrees to indemnify and hold harmless (from Bundy's own assets) GT&I, its officers, directors, shareholders, agents, attorneys, accountants and/or other representatives against any cost or expense (including counsel



**Mountain America Credit Union
Account Number Specification Sheet
Wire Instructions**

ID: 50

Description: Business Checking

This specification sheet is for the following credit union member(s):

ABISH HUSBONDI INC
3061 RIVERSIDE ROAD
MESQUITE, 89027

ABA Routing Number: 324079555

Account Number: 501013664849

Wire Instructions:

*Please note Mountain America Credit Union **does not** have a "Swiftcode." We do not handle exchange of foreign currency. The originating bank should have a corresponding bank in the United States they use to send wires through for this purpose. They will then forward to Mountain America Credit Union's routing number and the member's account number.

Incoming wire fee: \$10.00

If you have further questions regarding these instructions, please contact the Mountain America Credit Union Service Center at 1-800-748-4302.

This order is SIGNED.

Dated: September 23, 2024

William J. Thurman

**WILLIAM T. THURMAN
U.S. Bankruptcy Judge**



Erik F. Stidham (Idaho Bar No. 5483)
(Admitted *Pro Hac Vice*)
Robert A. Faucher (Idaho Bar No. 4745)
(Admitted *Pro Hac Vice*)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-7714
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rfaucher@hollandhart.com

Darren G. Reid (11163)
Engels Tejeda (11427)
Benjamin D. Passey (19234)
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222 S. Main Street, Suite 2200
Salt Lake City, UT 84101
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dgreid@hollandhart.com
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bdpassey@hollandhart.com

*Attorneys for St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd.,
Chris Roth, Natasha Erickson, M.D., and Tracy Jungman, NP*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In re:	Bankruptcy No. 24-23530
AMMON EDWARD BUNDY,	Chapter 7
Debtor.	Honorable William T. Thurman

**ORDER GRANTING ST. LUKE’S PARTIES’ MOTION PURSUANT TO
FED.R.BANKR.PRO. 2004 FOR AN ORDER AUTHORIZING AN EXAMINATION
OF, AND PRODUCTION OF DOCUMENTS BY, LISA BUNDY**

The Court having reviewed and considered The St. Luke’s Parties’ Motion Pursuant to Fed. R. Bankr. Pro. 2004 for an Order Authorizing an Examination of, and Production of Documents by, Lisa Bundy filed on September 20, 2024 (the “Motion”); and

Good cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. St. Luke’s Health System, Ltd., St. Luke’s Regional Medical Center, Ltd. Chris Roth, Natasha Erickson and Tracy Jungman, or any of them, are authorized to issue subpoenas to Lisa Bundy (1) for production of documents by her with at least 14 days’ prior written notice; and (2) for an oral examination of her with at least 14 days’ prior written notice.

----- End of Document -----

DESIGNATION OF PARTIES TO BE SERVED

Service for the foregoing Order shall be served to the parties and in the manner designated below:

By Electronic Service: I certify that the parties of record in this case as identified below are registered CM/ECF users and will be served notice of entry of the foregoing Order through the CM/ECF system.

Mark C. Rose trustee@mbt-law.com
McKay, Burton & Thurman, P.C.

U.S. Trustee USTPRegion19.SK.ECF@usdoj.gov

Darren G. Reid dgreid@hollandhart.com
Engels Tejada ejtejeda@hollandhart.com
Benjamin D. Passey bdpassey@hollandhart.com
Erik F. Stidham efstidham@hollandhart.com
Robert A. Faucher rfaucher@hollandhart.com
Holland & Hart LLP

By U.S. Mail / Electronic Mail: In addition to the parties of record receiving notice through the CM/ECF system, the following parties should be served Notice pursuant to Fed. R. Civ. P. 5(b).

By U.S. First Class Mail – postage prepaid:

Ammon Edward Bundy, *pro se*
P.O. Box 1062
Cedar City, UT 84721

Ammon Edward Bundy
896 E 400 S
New Harmony, UT 84757

Dated: September ___, 2024.

/_____

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PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)*: Lisa Bundy
on *(date)* 9/25/2024.

☐ I served the subpoena by delivering a copy to the named person as follows: _____
_____ on *(date)* _____; or

☒ I returned the subpoena unexecuted because: 09/25/2024 07:00 PM No answer at the door, people are inside but refuse to come to the door. 09/26/2024 01:06 PM No answer at the door. Called number posted on Bundy Motors website and reached subject via phone who stated she will not speak to me and hung up.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ _____ for travel and \$ 57.50 for services, for a total of \$ 57.50.

I declare under penalty of perjury that this information is true and correct.

Date: 10/07/2024



Server's signature

Randy Earl, G102068

Printed name and title

Beehive Attorney Service
107 S 1470 E, Suite 201
St George, UT 84790

Server's address

Additional information concerning attempted service, etc.:

AMENDED SUBPOENA FOR RULE 2004 EXAMINATION; FRCP 45; EXHIBIT A; ORDER GRANTING ST. LUKE'S PARTIES' MOTION PURSUANT TO FED.R.BANKR.PRO. 2004 FOR AN ORDER AUTHORIZING AN EXAMINATION OF, AND PRODUCTION OF DOCUMENTS BY, LISA BUNDY

B2540 (Form 2540 – Subpoena for Rule 2004 Examination) (12/15)

UNITED STATES BANKRUPTCY COURT

District of Utah

In re Ammon Edward Bundy
Debtor

Case No. 24-23530

Chapter 7

AMENDED SUBPOENA FOR RULE 2004 EXAMINATION

To: Lisa Bundy

(Name of person to whom the subpoena is directed)

☒ **Testimony:** **YOU ARE COMMANDED** to appear at the time, date, and place set forth below to testify at an examination under Rule 2004, Federal Rules of Bankruptcy Procedure. A copy of the court order authorizing the examination is attached.

PLACE
1819 S 120 E
St. George, UT 84790

DATE AND TIME
October 21, 2024
9:00 a.m. MDT

The examination will be recorded by this method: by stenographic means and audio-visual recording.
produce

☒ **Production:** You, or your representatives, must also bring with you to the examination the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

See Exhibits A, A.1 & A.2. Your production is due by October 15, 2024 at Holland & Hart LLP,
222 S. Main St., Ste. 2200 Salt Lake City, UT 84101.

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: September 25, 2024

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk


Attorney's signature

The name, address, email address, and telephone number of the attorney representing (name of party)
St. Luke's Health System, Ltd., who issues or requests this subpoena, are:

Robert A. Faucher, Holland & Hart LLP, 800 W. Main St., Ste. 1750, Boise, ID 83702 (208) 342-5000
rfaucher@hollandhart.com. Attorneys for St. Luke's Health System, Ltd.

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (*name of individual and title, if any*): _____
on (*date*) _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____
_____ on (*date*) _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true and correct.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information concerning attempted service, etc.:

Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)
(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)

(c) Place of compliance.

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises, at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) **Contempt.** The court for the district where compliance is required — and also, after a motion is transferred, the issuing court — may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT A

To Subpoena for Rule 2004 Examination, issued to Lisa Bundy
In Ammon Edward Bundy, Case No. 24-23530, United States Bankruptcy Court, District of Utah

You are obligated to produce the documents identified below, in accordance with the Definitions set forth below, no later than October 15, 2024. You shall produce copies of those documents at the following location:

Holland & Hart LLP
222 South Main Street
Suite 2200
Salt Lake City, UT 84101

Or, you may deliver the documents to that location and make them available for copying by the parties who issued the subpoena. Or, you may deliver the documents in electronic form to:

efstidham@hollandhart.com and
rfaucher@hollandhart.com

You shall identify, with respect to all of the produced Documents, the paragraph number of the request(s) below to which such Document is responsive.

The parties issuing this Subpoena are already in possession of the Already-Obtained Statements. You need not produce them.

DEFINITIONS

“Abish-husbondi” means Abish-husbondi Inc., a Wyoming corporation now known as Kekoa Grove, Inc.

“Already-Obtained Statements” means those bank account statements and credit union account statements identified at Exhibit A.1 hereto.

“Bankruptcy Case” means *In re Ammon Edward Bundy*, Case No. 24-23530, United States District Court, District of Utah.

“Books” means Documents consisting of books and records of a business enterprise, including without limitation, articles of organization, articles of incorporation, by-laws, meeting minutes, stock transfer ledgers, stock certificates or other evidence of equity ownership, indemnification agreements and shareholders’ agreements.

“Bundys” means You and Ammon Edward Bundy.

“Cash Transfers” means those cash deposits Ammon Bundy made into Abish-husbondi bank accounts or credit union accounts as follows:

Date	Amount
August 14, 2020	\$69,000.00
August 19, 2020	\$26,600.00
December 14, 2020	\$50,000.00
February 26, 2021	\$49,800.00
May 17, 2021	\$40,000.00
August 10, 2021	\$ 9,980.00
August 18, 2021	\$59,800.00
September 17, 2021	\$50,000.00
May 31, 2023	\$14,800.00
October 12, 2023	\$17,500.00

“Chambers Transfer” means a transfer of money in the approximate amount of \$487,167.36 from the law offices of Harris, Preston & Chambers to the MA Account.

“Document” or “Documents” shall mean the original, all copies and drafts of papers and writings and data of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, texts, voice messages, instant messages, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, telegrams, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, lab books, lab notes, lab journals or notebooks, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, deeds, mortgages, deeds of trust, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, trust, releases of claims, charters, certificates, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. “Documents” shall include “Electronically Stored Information” as defined herein. “Documents” shall include all of the foregoing transmitted through, or stored in, without limitation, the Signal messaging service. “Documents” shall mean all of the foregoing Documents in Your custody or control.

“Electronically Stored Information” means information made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Electronically Stored Information shall include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones,

Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

“Estopped Certificate” means that Estopped [sic] Certificate, Release & Waiver attached to this subpoena as Exhibit A.2.

“Financial Account Statements” means Documents, including account statements and correspondence, with respect to any financial accounts, including without limitation bank accounts, credit union accounts, securities accounts, credit card accounts, commodities accounts, retirement accounts, 401(k) accounts, Roth accounts, IRA accounts and investment accounts, including all attachments to such statements (such as copies of checks); provided, however, that the term does not include the Already-Obtained Statements.

“Financial Records” means Documents consisting of Financial Account Statements, financial records and software of a business enterprise, whether or not incorporated, including without limitation account and other ledgers, bookkeeping data, accounting data, QuickBooks, etc.

“Former Residence” means that real property in Gem County, Idaho with a street address of 4615 Harvest Lane, Emmett, ID 83617.

“Idaho Litigation” means that lawsuit styled *St. Luke’s Health System, Ltd., et al. v. Ammon Bundy, et al.*, Case No. CV-01-22-06789, Fourth Judicial District Court, State of Idaho, County of Ada.

“Judgment” means, collectively, the following court filings in the Idaho Litigation: (i) Default Judgment entered August 29, 2023; (ii) Order on Verdict and Default Judgment entered August 29, 2023.

“PRN” means People’s Rights Network, an unincorporated association with which You have been affiliated.

“Schedules” means the schedule of assets, schedule of liabilities and other schedules filed at docket nos. 5 and 19 in the Bankruptcy Case.

“Statements” means Your statement of financial affairs and other statements filed at docket no. 5 in the Bankruptcy Case.

“You” means Lisa Bundy, your agents, attorneys, employees, representatives, investigators, consultants and attorneys, and “Your” is the possessive form of You.

Documents You are Obligated to Produce

1. All Books of You from January 1, 2020-present.
2. All Financial Records of You from January 1, 2020-present.

3. All Financial Account Statements of You from January 1, 2020-present other than the Already-Obtained Statements.
4. All Documents relating to or evidencing assets in your possession or ownership at any date subsequent to January 1, 2020 of a value exceeding \$500, whether those assets consist of financial accounts (e.g., bank accounts, credit union accounts, securities accounts, commodity accounts, insurance accounts, etc.), financial assets, notes, bonds, stock certificates, equity interests, jewelry, motor vehicles, equipment, household goods, cash, claims, real property, or any other kind of asset, whether tangible or intangible. Notwithstanding the foregoing, you need not produce any documents relating to your Former Residence.
5. All Documents relating to or evidencing assets conveyed to You or by You subsequent to January 1, 2020 of a value exceeding \$500, whether those assets consist of financial accounts (e.g., bank accounts, credit union accounts, securities accounts, commodity accounts, insurance accounts, etc.), financial assets, notes, bonds, jewelry, motor vehicles, equipment, household goods, cash, claims, real property, or any other kind of asset, whether tangible or intangible. Notwithstanding the foregoing, you need not produce any documents relating to your Former Residence.
6. Your personal federal tax returns and schedules for the years 2020-present
7. Your personal state tax returns and schedules for the years 2020-present.
8. Your most recently filed federal income tax return.
9. Your most recently filed state income tax return.
10. All tax forms statements issued to you on and after January 1, 2020, such as IRS Form 1099, IRS Form W-2, and IRS Schedule K-1.
11. All Documents pertaining to the Cash Transfers and the transactions that gave rise to them, other than Already-Obtained Statements, including without limitation agreements, receipts, or invoices.
12. All Documents pertaining to any transfers of value of more than \$500 from Bundys to any other person from the period January 1, 2022-present.
13. Documents consisting of any trust agreements pertaining to any trust as to which You are or have been since January 1, 2020, a grantor, trustee, or beneficiary.
14. All Documents evidencing or relating to Your interest in any real property which you now own or have owned since January 1, 2000.
15. All Documents relating to the Estopped Certificate.

16. All Documents relevant to all transactions in which You or Ammon Bundy has engaged to hinder, delay or impair the St. Luke's Parties' efforts to collect on or enforce the Judgment, including without limitation the Chambers Transfer but not including Documents pertaining to the Former Residence.
17. All Documents in Your possession or control relating to (1) websites operated by PRN or associated with PRN's activities, and (2) websites affiliated with St. Luke's Exposed or Stlukesexposed.
18. All Documents exchanged between the Bundys and Jane Valenzuela, an Arizona resident, and all documents pertaining to the transactions between Valenzuela and any the Bundys.
19. All Documents pertaining to any asset in which You have any beneficial interest but in the possession or control or ownership of another person, including without limitation any asset which You believe should be returned to You or Ammon Bundy at some point in the future.
20. All Documents evidencing or pertaining to any property you inherited since January 1, 2020.
21. Any Documents in Your possession evidencing an inaccuracy in the Schedules or the Statements.

EXHIBIT A.1

Already Obtained Statements

CLARITY CREDIT UNION ACCOUNT
STATEMENTS

Account Holder	Account Number	Dates
Abish-Husbondi	***1572	Aug 31, 2020 - March 31, 2024
Ammon Bundy – Ammon Bundy for Governor	***2161	May 31, 2021 – Feb 28, 2023
Bowen Bundy (Lisa Bundy joint holder)	***2128	May 31, 2021 – March 31, 2024
Dono Custos INC	***1719	Oct 31, 2020 – March 31, 2024
Farm Inc Bundy	***1571	Aug 31, 2020 - Jan 31, 2023
Hayden Bundy	***2127	May 31, 2021 - March 31, 2024
Lisa Bundy	***1616	Sep 30, 2020 – March 31, 2024

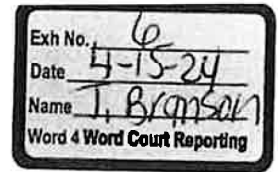
EXHIBIT A.1 TO SUBPOENA - 1

WELLS FARGO BANK ACCOUNT
STATEMENTS

Account Holder	Account Number	Dates
Abish Husbondi Inc	*****4772	Aug 30, 2019 – Dec 31, 2020
Abish Husbondi Inc	*****7284	Aug 31, 2019 - Oct 31, 2020
Abish Husbondi Inc	*****4778	Aug 31, 2019 – Dec 31, 2020
Ammon Bundy	*****4297	Oct 17, 2018 - Jan 16, 2020
Bundy Farm Inc AKA Bundy Melons	*****7835	Feb 29, 2020 – Dec 31, 2020
Halle Bundy	*****2035	Feb 29, 2020
Halle Bundy	*****7147	Feb 28, 2020 - Sep 28, 2020
Lisa Bundy	*****0547	Oct 22, 2018 - Sep 30, 2020
Lisa Bundy	*****9358	Oct 22, 2018 - Sep 30, 2020
Valet Fleet Services, LLC	*****6948	June 30, 2019 – Sep 30, 2023
Valet Fleet Services, LLC	*****6955	Jan 1, 2018 – May 31, 2019

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EXHIBIT A.1 TO SUBPOENA - 2



**ESTOPPED CERTIFICATE,
RELEASE & WAIVER**

Recitals

Global Trading & Investments, Inc., an Idaho corporation ("GT&I") is in possession of certain funds belonging to Ammon E. and Lisa M. Bundy (collectively "Bundy"). GT&I and its principals desire to distribute the funds to Bundy (or to such party or parties as Bundy directs) and upon distributions be released of any further liability with regards to said funds.

Estoppel, Release & Waiver

NOWHEREFORE, for good and valuable consideration, and GT&I's reliance on Bundy's execution of this instrument, the parties to this agreement represent and agree to the following:

A. Waiver of Accounting. Bundy waives any further accounting of the funds. Upon receipt of the signed release GT&I shall cause to be disbursed to Abish-husband, Inc., the sum of \$487,167.36 (\$507,167.36473,000 less \$20,000.00).

B. Full & Complete Distribution. Except for the \$20,000 fee the distribution represents a full and complete satisfaction of Bundy's interest in the funds and GT&I's obligation to Bundy.


C. Release. Bundy releases and forever discharges GT&I, their officers, directors, shareholders, agents, attorneys, accountants and/or other representatives, from all actions, claims and demands whatsoever including but not limited to any claim(s) relating to the Loan Servicing and Stock Investment Arrangements, and any other act, matter, cause, or thing whatsoever arising out of the aforesaid transactions or the administration of such funds received from Bundy. *Bundy understands that they have the right to obtain advice concerning this instrument from independent legal counsel of their choice, at their cost, and represents that they have either done so prior to executing this instrument or have knowingly elected voluntarily to waive any such right at this time.*


D. Estoppel Certificate. Bundy understands and agrees that by executing this instrument that GT&I and its agents are relying on the Bundy's representation in this instrument in making the distribution as directed by Bundy, instead of interpleading the funds into a court to obtain court approval. Bundy understands and agrees that if they sign this instrument, they will be forever estopped from challenging this instrument in any fashion

E. Indemnification. Bundy agrees to indemnify and hold harmless (from Bundy's own assets) GT&I, its officers, directors, shareholders, agents, attorneys, accountants and/or other representatives against any cost or expense (including counsel

fees) or liability arising out of any acts which breach this instrument including, but not limited to, any legal or non-legal action which seeks to challenge, void or set aside this instrument (whether successful or unsuccessful) initiated by Bundy.

F. Entire Understanding and Agreement - Integration Clause. This Instrument constitutes the entire understanding and agreement between the parties and supersedes any and all prior or contemporaneous negotiations, representations and/or agreements, whether written or oral. This instrument may be amended only by written instrument expressly referring hereto, and duly signed by both the Bundy and GT&I. In the event any provision or portion hereof is held to be invalid or unenforceable, the remaining provisions and/or portions shall remain valid and enforceable.


Signature
Ammon Bundy
Printed Name


Signature
Lisa Bundy
Printed Name

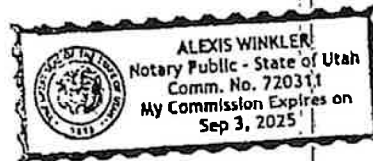
STATE OF Utah)
:ss.
County of Iron)

On the 5th day of January, 2023⁴, before me,
Alexis Winkler, (NAME OF NOTARY) the undersigned Notary Public,
personally appeared, Ammon and Lisa Bundy.

who is personally known to me, or
who proved to me on the basis of satisfactory evidence

to be the person(s) whose name is/are subscribed to the within instrument, and acknowledged to me that he/she/they executed the same. Witness my hand and official seal.


Notary Public



(This area for official Notarial seal)



**Mountain America Credit Union
Account Number Specification Sheet
Wire Instructions**

ID: 50

Description: Business Checking

This specification sheet is for the following credit union member(s):

**ABISH HUSBONDI INC
3061 RIVERSIDE ROAD
MESQUITE, 89027**

ABA Routing Number: 324079555

Account Number: 501013664849

Wire Instructions:

***Please note Mountain America Credit Union does not have a "Swiftcode." We do not handle exchange of foreign currency. The originating bank should have a corresponding bank in the United States they use to send wires through for this purpose. They will then forward to Mountain America Credit Union's routing number and the member's account number.**

Incoming wire fee: \$10.00

If you have further questions regarding these instructions, please contact the Mountain America Credit Union Service Center at 1-800-748-4302.

This order is SIGNED.

Dated: September 23, 2024

William J. Thurman

**WILLIAM T. THURMAN
U.S. Bankruptcy Judge**



Erik F. Stidham (Idaho Bar No. 5483)
(Admitted *Pro Hac Vice*)
Robert A. Faucher (Idaho Bar No. 4745)
(Admitted *Pro Hac Vice*)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-7714
Telephone: (208) 342-5000
efstidham@hollandhart.com
rfaucher@hollandhart.com

Darren G. Reid (11163)
Engels Tejeda (11427)
Benjamin D. Passey (19234)
HOLLAND & HART LLP
222 S. Main Street, Suite 2200
Salt Lake City, UT 84101
Telephone: (801) 799-5800
dgreid@hollandhart.com
ejtejeda@hollandhart.com
bdpassey@hollandhart.com

*Attorneys for St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd.,
Chris Roth, Natasha Erickson, M.D., and Tracy Jungman, NP*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In re:	Bankruptcy No. 24-23530
AMMON EDWARD BUNDY,	Chapter 7
Debtor.	Honorable William T. Thurman

**ORDER GRANTING ST. LUKE'S PARTIES' MOTION PURSUANT TO
FED.R.BANKR.PRO. 2004 FOR AN ORDER AUTHORIZING AN EXAMINATION
OF, AND PRODUCTION OF DOCUMENTS BY, LISA BUNDY**

The Court having reviewed and considered The St. Luke's Parties' Motion Pursuant to Fed. R. Bankr. Pro. 2004 for an Order Authorizing an Examination of, and Production of Documents by, Lisa Bundy filed on September 20, 2024 (the "Motion"); and

Good cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd. Chris Roth, Natasha Erickson and Tracy Jungman, or any of them, are authorized to issue subpoenas to Lisa Bundy (1) for production of documents by her with at least 14 days' prior written notice; and (2) for an oral examination of her with at least 14 days' prior written notice.

----- End of Document -----

DESIGNATION OF PARTIES TO BE SERVED

Service for the foregoing Order shall be served to the parties and in the manner designated below:

By Electronic Service: I certify that the parties of record in this case as identified below are registered CM/ECF users and will be served notice of entry of the foregoing Order through the CM/ECF system.

Mark C. Rose trustee@mbt-law.com
McKay, Burton & Thurman, P.C.

U.S. Trustee USTPRegion19.SK.ECF@usdoj.gov

Darren G. Reid dgreid@hollandhart.com
Engels Tejada ejtejeda@hollandhart.com
Benjamin D. Passey bdpassey@hollandhart.com
Erik F. Stidham efstidham@hollandhart.com
Robert A. Faucher rfaucher@hollandhart.com
Holland & Hart LLP

By U.S. Mail / Electronic Mail: In addition to the parties of record receiving notice through the CM/ECF system, the following parties should be served Notice pursuant to Fed. R. Civ. P. 5(b).

By U.S. First Class Mail – postage prepaid:

Ammon Edward Bundy, *pro se*
P.O. Box 1062
Cedar City, UT 84721

Ammon Edward Bundy
896 E 400 S
New Harmony, UT 84757

Dated: September __, 2024.

/_____

32813091_v1



USPS TRACKING #



9114 9022 0078 9336 5331 77

Label 400 Jan. 2013
7690-16-000-7948

 \$009.80⁰
10/02/2024 ZIP 83702
043M31213660
USPS

FIRST CLASS MAIL

 **Holland & Hart**

800 W. Main Street, Suite 1750
Boise, ID 83702-5974
MAILING ADDRESS
P.O. Box 2527
Boise, ID 83701-2527

PRIORITY MAIL

Lisa Bundy
P.O. Box 1062
Cedar City, UT 84721

LISA BUNDY
PO BOX 1062
CEDAR CITY UT 84721-0991



CARRIER ROUTE	COUNTY	DELIVERY POINT CODE
B003	IRON	62
CHECK DIGIT	COMMERCIAL MAIL RECEIVING AGENCY	LAC™
1	N	-
eLOT™	eLOT ASCENDING/DESCENDING INDICATOR	RECORD TYPE CODE
0005	A	P
PMB DESIGNATOR	PMB NUMBER	DEFAULT FLAG
-	-	-
EWS FLAG	DPV CONFIRMATION INDICATOR	
-	Y	

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SUE TURNER
2083425000
HOLLAND & HART LLP
800 W. MAIN STREET
BOISE ID 83702
0.3LBS LTR 1 OF 1

SHIP TO:
LISA BUNDY
LISA BUNDY
896 E 400 S
NEW HARMONY UT 84657

UT 847 1-02



UPS NEXT DAY AIR 1

TRACKING #: 1Z E79 W29 01 9011 9706



BILLING: P/P

Client Matter #: 84416.0021
Payroll ID: 0847 R Fall 1st
25215.000. WINTER/SO 01.00A 09/2024*



WE ♡ LOGISTICS™

Logistics is all about efficiency, service and smart ways of moving things around the planet.
This envelope made of recycled paper can be used twice - a more intelligent use of resources.



Your shipment
1ZE79W290190119706

✓ Delivered On

Friday, October 04 at 1:32 P.M. See Delivery Photo

Delivered To
NEW HARMONY, UT US

[Proof of Delivery >](#)

- ✓ **Label Created**
United States
10/02/2024, 3:36 P.M.
- ✓ **We Have Your Package**
Boise, ID, United States
10/02/2024, 5:42 P.M.
- ✓ **On the Way**
Cedar City, UT, United States
10/04/2024, 9:51 A.M.
- **Delivered**
NEW HARMONY, UT, US
10/04/2024, 1:32 P.M.

[View All Shipping Details >](#)



Get Answers Fast

If you need help, use the [Virtual Assistant](#). Still stuck? Try our [Tracking Support](#) for more specific guidance.

Shipment Progress

Shipment Details

You've Got the Details

You're seeing what customer service agents would share with you. If you need more support, use the [Virtual Assistant](#) or contact your shipper.



Times shown are in Local Time [Change](#)

10/04/2024 1:32 P.M.	Delivered DELIVERED NEW HARMONY, UT, US
10/04/2024 9:51 A.M.	On the Way Loaded on Delivery Vehicle Cedar City, UT, United States
10/04/2024 8:16 A.M.	Processing at UPS Facility Cedar City, UT, United States
10/04/2024 7:54 A.M.	Arrived at Facility Cedar City, UT, United States
10/04/2024 2:54 A.M.	Departed from Facility Salt Lake City, UT, United States
10/03/2024 9:41 P.M.	Arrived at Facility Salt Lake City, UT, United States
10/03/2024 9:16 P.M.	Departed from Facility Salt Lake City, UT, United States
10/03/2024 1:37 P.M.	Pickup Scan Salina, UT, United States
10/03/2024 9:07 A.M.	We've corrected the postal code, and the package is on its way to the up- dated address. Salina, UT, United States
10/03/2024 6:00 A.M.	Departed from Facility Salt Lake City, UT, United States
10/03/2024 4:52 A.M.	Arrived at Facility Salt Lake City, UT, United States

10/03/2024 2:17 A.M.	Departed from Facility Ontario, CA, United States
10/02/2024 8:04 P.M.	Arrived at Facility Ontario, CA, United States
10/02/2024 7:01 P.M.	Departed from Facility Boise, ID, United States
10/02/2024 5:42 P.M.	We Have Your Package Arrived at Facility Boise, ID, United States
10/02/2024 3:36 P.M.	Label Created Shipper created a label, UPS has not received the package yet. United States

From: Robert Faucher
Sent: Wednesday, October 2, 2024 4:19 PM
To: bundylmlb@gmail.com; bundylm.lb@gmail.com
Cc: A Bundy; aebundy@msn.com
Subject: In re Ammon Bundy, Case No. 24-23530, United States Bankruptcy Court, District of Utah
Attachments: 4035_001.pdf; 4034_001.pdf

Dear Mrs. Bundy,

I'm hereby serving upon you a second amended subpoena in the Ammon Bundy bankruptcy case.

Please call me if you have any questions or concerns.



**Holland
& Hart**

Bob Faucher
Partner

HOLLAND & HART LLP

800 W. Main Street, Suite 1750, Boise, ID 83702

rfaucher@hollandhart.com | **T:** (208) 383-3941 | **M:** (208) 283-6781 | **F:** (208) 343-8869

CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this email.

B2540 (Form 2540 – Subpoena for Rule 2004 Examination) (12/15)

UNITED STATES BANKRUPTCY COURT

District of Utah

In re Ammon Edward Bundy
Debtor

Case No. 24-23530

Chapter 7

SECOND AMENDED SUBPOENA FOR RULE 2004 EXAMINATION

To: Lisa Bundy

(Name of person to whom the subpoena is directed)

☒ **Testimony:** **YOU ARE COMMANDED** to appear at the time, date, and place set forth below to testify at an examination under Rule 2004, Federal Rules of Bankruptcy Procedure. A copy of the court order authorizing the examination is attached.

PLACE

1819 S 120 E
St. George, UT 84790

DATE AND TIME

October 21, 2024
9:00 a.m. MDT

The examination will be recorded by this method: by stenographic means and audio-visual recording.
produce

☒ **Production:** You, or your representatives, must also bring with you to the examination the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

See Exhibits A, A.1 & A.2. Your production is due by October 17, 2024 at Holland & Hart LLP,
222 S. Main St., Ste. 2200 Salt Lake City, UT 84101.

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: ~~September 25, 2024~~ October 2, 2024

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, email address, and telephone number of the attorney representing (name of party)
St. Luke's Health System, Ltd., who issues or requests this subpoena, are:

Robert A. Faucher, Holland & Hart LLP, 800 W. Main St., Ste. 1750, Boise, ID 83702 (208) 342-5000
rfaucher@hollandhart.com, Attorneys for St. Luke's Health System, Ltd.

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

B2540 (Form 2540 – Subpoena for Rule 2004 Examination) (Page 2)

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)*: _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____
_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true and correct.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information concerning attempted service, etc.:

Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)
(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)

(c) Place of compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises, at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense: Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
 - (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
 - (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv) subjects a person to undue burden.
- (B) When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

...

(g) Contempt. The court for the district where compliance is required — and also, after a motion is transferred, the issuing court — may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT A

To Subpoena for Rule 2004 Examination, issued to Lisa Bundy
In Ammon Edward Bundy, Case No. 24-23530, United States Bankruptcy Court, District of Utah

You are obligated to produce the documents identified below, in accordance with the Definitions set forth below, no later than October 15, 2024. You shall produce copies of those documents at the following location:

Holland & Hart LLP
222 South Main Street
Suite 2200
Salt Lake City, UT 84101

Or, you may deliver the documents to that location and make them available for copying by the parties who issued the subpoena. Or, you may deliver the documents in electronic form to:

efstidham@hollandhart.com and
rfaucher@hollandhart.com

You shall identify, with respect to all of the produced Documents, the paragraph number of the request(s) below to which such Document is responsive.

The parties issuing this Subpoena are already in possession of the Already-Obtained Statements. You need not produce them.

DEFINITIONS

“Abish-husbondi” means Abish-husbondi Inc., a Wyoming corporation now known as Kekoa Grove, Inc.

“Already-Obtained Statements” means those bank account statements and credit union account statements identified at Exhibit A.1 hereto.

“Bankruptcy Case” means *In re Ammon Edward Bundy*, Case No. 24-23530, United States District Court, District of Utah.

“Books” means Documents consisting of books and records of a business enterprise, including without limitation, articles of organization, articles of incorporation, by-laws, meeting minutes, stock transfer ledgers, stock certificates or other evidence of equity ownership, indemnification agreements and shareholders’ agreements.

“Bundys” means You and Ammon Edward Bundy.

“Cash Transfers” means those cash deposits Ammon Bundy made into Abish-husbondi bank accounts or credit union accounts as follows:

Date	Amount
August 14, 2020	\$69,000.00
August 19, 2020	\$26,600.00
December 14, 2020	\$50,000.00
February 26, 2021	\$49,800.00
May 17, 2021	\$40,000.00
August 10, 2021	\$ 9,980.00
August 18, 2021	\$59,800.00
September 17, 2021	\$50,000.00
May 31, 2023	\$14,800.00
October 12, 2023	\$17,500.00

“Chambers Transfer” means a transfer of money in the approximate amount of \$487,167.36 from the law offices of Harris, Preston & Chambers to the MA Account.

“Document” or “Documents” shall mean the original, all copies and drafts of papers and writings and data of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, texts, voice messages, instant messages, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, telegrams, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, lab books, lab notes, lab journals or notebooks, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, deeds, mortgages, deeds of trust, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, trust, releases of claims, charters, certificates, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. “Documents” shall include “Electronically Stored Information” as defined herein. “Documents” shall include all of the foregoing transmitted through, or stored in, without limitation, the Signal messaging service. “Documents” shall mean all of the foregoing Documents in Your custody or control.

“Electronically Stored Information” means information made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Electronically Stored Information shall include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones,

Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

“Estopped Certificate” means that Estopped [sic] Certificate, Release & Waiver attached to this subpoena as Exhibit A.2.

“Financial Account Statements” means Documents, including account statements and correspondence, with respect to any financial accounts, including without limitation bank accounts, credit union accounts, securities accounts, credit card accounts, commodities accounts, retirement accounts, 401(k) accounts, Roth accounts, IRA accounts and investment accounts, including all attachments to such statements (such as copies of checks); provided, however, that the term does not include the Already-Obtained Statements.

“Financial Records” means Documents consisting of Financial Account Statements, financial records and software of a business enterprise, whether or not incorporated, including without limitation account and other ledgers, bookkeeping data, accounting data, QuickBooks, etc.

“Former Residence” means that real property in Gem County, Idaho with a street address of 4615 Harvest Lane, Emmett, ID 83617.

“Idaho Litigation” means that lawsuit styled *St. Luke's Health System, Ltd., et al. v. Ammon Bundy, et al.*, Case No. CV-01-22-06789, Fourth Judicial District Court, State of Idaho, County of Ada.

“Judgment” means, collectively, the following court filings in the Idaho Litigation: (i) Default Judgment entered August 29, 2023; (ii) Order on Verdict and Default Judgment entered August 29, 2023.

“PRN” means People's Rights Network, an unincorporated association with which You have been affiliated.

“Schedules” means the schedule of assets, schedule of liabilities and other schedules filed at docket nos. 5 and 19 in the Bankruptcy Case.

“Statements” means Your statement of financial affairs and other statements filed at docket no. 5 in the Bankruptcy Case.

“You” means Lisa Bundy, your agents, attorneys, employees, representatives, investigators, consultants and attorneys, and “Your” is the possessive form of You.

Documents You are Obligated to Produce

1. All Books of You from January 1, 2020-present.
2. All Financial Records of You from January 1, 2020-present.

3. All Financial Account Statements of You from January 1, 2020-present other than the Already-Obtained Statements.
4. All Documents relating to or evidencing assets in your possession or ownership at any date subsequent to January 1, 2020 of a value exceeding \$500, whether those assets consist of financial accounts (e.g., bank accounts, credit union accounts, securities accounts, commodity accounts, insurance accounts, etc.), financial assets, notes, bonds, stock certificates, equity interests, jewelry, motor vehicles, equipment, household goods, cash, claims, real property, or any other kind of asset, whether tangible or intangible. Notwithstanding the foregoing, you need not produce any documents relating to your Former Residence.
5. All Documents relating to or evidencing assets conveyed to You or by You subsequent to January 1, 2020 of a value exceeding \$500, whether those assets consist of financial accounts (e.g., bank accounts, credit union accounts, securities accounts, commodity accounts, insurance accounts, etc.), financial assets, notes, bonds, jewelry, motor vehicles, equipment, household goods, cash, claims, real property, or any other kind of asset, whether tangible or intangible. Notwithstanding the foregoing, you need not produce any documents relating to your Former Residence.
6. Your personal federal tax returns and schedules for the years 2020-present
7. Your personal state tax returns and schedules for the years 2020-present.
8. Your most recently filed federal income tax return.
9. Your most recently filed state income tax return.
10. All tax forms statements issued to you on and after January 1, 2020, such as IRS Form 1099, IRS Form W-2, and IRS Schedule K-1.
11. All Documents pertaining to the Cash Transfers and the transactions that gave rise to them, other than Already-Obtained Statements, including without limitation agreements, receipts, or invoices.
12. All Documents pertaining to any transfers of value of more than \$500 from Bundys to any other person from the period January 1, 2022-present.
13. Documents consisting of any trust agreements pertaining to any trust as to which You are or have been since January 1, 2020, a grantor, trustee, or beneficiary.
14. All Documents evidencing or relating to Your interest in any real property which you now own or have owned since January 1, 2000.
15. All Documents relating to the Estopped Certificate.

16. All Documents relevant to all transactions in which You or Ammon Bundy has engaged to hinder, delay or impair the St. Luke's Parties' efforts to collect on or enforce the Judgment, including without limitation the Chambers Transfer but not including Documents pertaining to the Former Residence.
17. All Documents in Your possession or control relating to (1) websites operated by PRN or associated with PRN's activities, and (2) websites affiliated with St. Luke's Exposed or St. Luke's Exposed.
18. All Documents exchanged between the Bundys and Jane Valenzuela, an Arizona resident, and all documents pertaining to the transactions between Valenzuela and any the Bundys.
19. All Documents pertaining to any asset in which You have any beneficial interest but in the possession or control or ownership of another person, including without limitation any asset which You believe should be returned to You or Ammon Bundy at some point in the future.
20. All Documents evidencing or pertaining to any property you inherited since January 1, 2020.
21. Any Documents in Your possession evidencing an inaccuracy in the Schedules or the Statements.

EXHIBIT A.1

Already Obtained Statements

CLARITY CREDIT UNION ACCOUNT STATEMENTS

Account Holder	Account Number	Dates
Abish-Husbondi	***1572	Aug 31, 2020 - March 31, 2024
Ammon Bundy - Ammon Bundy for Governor	***2161	May 31, 2021 - Feb 28, 2023
Bowen Bundy (Lisa Bundy joint holder)	***2128	May 31, 2021 - March 31, 2024
Dono Custos INC	***1719	Oct 31, 2020 - March 31, 2024
Farm Inc Bundy	***1571	Aug 31, 2020 - Jan 31, 2023
Hayden Bundy	***2127	May 31, 2021 - March 31, 2024
Lisa Bundy	***1616	Sep 30, 2020 - March 31, 2024

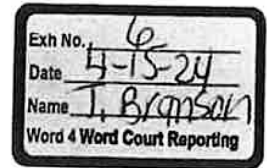
EXHIBIT A.1 TO SUBPOENA - 1

WELLS FARGO BANK ACCOUNT
STATEMENTS

Account Holder	Account Number	Dates
Abish Husbondi Inc	*****4772	Aug 30, 2019 – Dec 31, 2020
Abish Husbondi Inc	*****7284	Aug 31, 2019 - Oct 31, 2020
Abish Husbondi Inc	*****4778	Aug 31, 2019 – Dec 31, 2020
Ammon Bundy	*****4297	Oct 17, 2018 - Jan 16, 2020
Bundy Farm Inc AKA Bundy Melons	*****7835	Feb 29, 2020 – Dec 31, 2020
Halle Bundy	*****2035	Feb 29, 2020
Halle Bundy	*****7147	Feb 28, 2020 - Sep 28, 2020
Lisa Bundy	*****0547	Oct 22, 2018 - Sep 30, 2020
Lisa Bundy	*****9358	Oct 22, 2018 - Sep 30, 2020
Valet Fleet Services, LLC	*****6948	June 30, 2019 – Sep 30, 2023
Valet Fleet Services, LLC	*****6955	Jan 1, 2018 – May 31, 2019

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EXHIBIT A.1 TO SUBPOENA - 2



**ESTOPPED CERTIFICATE,
RELEASE & WAIVER**

Recitals

Global Trading & Investments, Inc., an Idaho corporation ("GT&I") is in possession of certain funds belonging to Ammon E. and Lisa M. Bundy (collectively "Bundy"). GT&I and its principals desire to distribute the funds to Bundy (or to such party or parties as Bundy directs) and upon distributions be released of any further liability with regards to said funds.

Estoppel, Release & Waiver

NOWHEREFORE, for good and valuable consideration, and GT&I's reliance on Bundy's execution of this instrument, the parties to this agreement represent and agree to the following:

A. Waiver of Accounting. Bundy waives any further accounting of the funds. Upon receipt of the signed release GT&I shall cause to be disbursed to Abish-husband, Inc., the sum of \$487,167.36 (\$507,167.36473,000 less \$20,000.00).

B. Full & Complete Distribution. Except for the \$20,000 fee the distribution represents a full and complete satisfaction of Bundy's interest in the funds and GT&I's obligation to Bundy.

C. Release. Bundy releases and forever discharges GT&I, their officers, directors, shareholders, agents, attorneys, accountants and/or other representatives, from all actions, claims and demands whatsoever including but not limited to any claim(s) relating to the Loan Servicing and Stock Investment Arrangements, and any other act, matter, cause, or thing whatsoever arising out of the aforesaid transactions or the administration of such funds received from Bundy. *Bundy understands that they have the right to obtain advice concerning this instrument from independent legal counsel of their choice, at their cost, and represents that they have either done so prior to executing this instrument or have knowingly elected voluntarily to waive any such right at this time.*

D. Estoppel Certificate. Bundy understands and agrees that by executing this instrument that GT&I and its agents are relying on the Bundy's representation in this instrument in making the distribution as directed by Bundy, instead of interpleading the funds into a court to obtain court approval. Bundy understands and agrees that if they sign this instrument, they will be forever estopped from challenging this instrument in any fashion

E. Indemnification. Bundy agrees to indemnify and hold harmless (from Bundy's own assets) GT&I, its officers, directors, shareholders, agents, attorneys, accountants and/or other representatives against any cost or expense (including counsel



**Mountain America Credit Union
Account Number Specification Sheet
Wire Instructions**

ID: 50

Description: Business Checking

This specification sheet is for the following credit union member(s):

ABISH HUSBONDI INC
3061 RIVERSIDE ROAD
MESQUITE, 89027

ABA Routing Number: 324079555

Account Number: 501013664849

Wire Instructions:

*Please note Mountain America Credit Union **does not** have a "Swiftcode." We do not handle exchange of foreign currency. The originating bank should have a corresponding bank in the United States they use to send wires through for this purpose. They will then forward to Mountain America Credit Union's routing number and the member's account number.

Incoming wire fee: \$10.00

If you have further questions regarding these instructions, please contact the Mountain America Credit Union Service Center at 1-800-748-4302.

This order is SIGNED.

Dated: September 23, 2024

William T. Thurman

**WILLIAM T. THURMAN
U.S. Bankruptcy Judge**



Erik F. Stidham (Idaho Bar No. 5483)
(Admitted *Pro Hac Vice*)
Robert A. Faucher (Idaho Bar No. 4745)
(Admitted *Pro Hac Vice*)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-7714
Telephone: (208) 342-5000
efstidham@hollandhart.com
rfaucher@hollandhart.com

Darren G. Reid (11163)
Engels Tejada (11427)
Benjamin D. Passey (19234)
HOLLAND & HART LLP
222 S. Main Street, Suite 2200
Salt Lake City, UT 84101
Telephone: (801) 799-5800
dgreid@hollandhart.com
ejtejeda@hollandhart.com
bdpassey@hollandhart.com

*Attorneys for St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd.,
Chris Roth, Natasha Erickson, M.D., and Tracy Jungman, NP*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In re:	Bankruptcy No. 24-23530
AMMON EDWARD BUNDY,	Chapter 7
Debtor.	Honorable William T. Thurman

**ORDER GRANTING ST. LUKE'S PARTIES' MOTION PURSUANT TO
FED.R.BANKR.PRO. 2004 FOR AN ORDER AUTHORIZING AN EXAMINATION
OF, AND PRODUCTION OF DOCUMENTS BY, LISA BUNDY**

The Court having reviewed and considered The St. Luke's Parties' Motion Pursuant to Fed. R. Bankr. Pro. 2004 for an Order Authorizing an Examination of, and Production of Documents by, Lisa Bundy filed on September 20, 2024 (the "Motion"); and

Good cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd. Chris Roth, Natasha Erickson and Tracy Jungman, or any of them, are authorized to issue subpoenas to Lisa Bundy (1) for production of documents by her with at least 14 days' prior written notice; and (2) for an oral examination of her with at least 14 days' prior written notice.

----- End of Document -----

DESIGNATION OF PARTIES TO BE SERVED

Service for the foregoing Order shall be served to the parties and in the manner designated below:

By Electronic Service: I certify that the parties of record in this case as identified below are registered CM/ECF users and will be served notice of entry of the foregoing Order through the CM/ECF system.

Mark C. Rose trustee@mbt-law.com
McKay, Burton & Thurman, P.C.

U.S. Trustee USTPRegion19.SK.ECF@usdoj.gov

Darren G. Reid dgreid@hollandhart.com
Engels Tejada ejtejada@hollandhart.com
Benjamin D. Passey bdpassey@hollandhart.com
Erik F. Stidham efstidham@hollandhart.com
Robert A. Faucher rfaucher@hollandhart.com
Holland & Hart LLP

By U.S. Mail / Electronic Mail: In addition to the parties of record receiving notice through the CM/ECF system, the following parties should be served Notice pursuant to Fed. R. Civ. P. 5(b).

By U.S. First Class Mail – postage prepaid:

Ammon Edward Bundy, *pro se*
P.O. Box 1062
Cedar City, UT 84721

Ammon Edward Bundy
896 E 400 S
New Harmony, UT 84757

Dated: September __, 2024.

Case 24-23530 Doc 180 Filed 11/07/24 Entered 11/07/24 16:35:50 Desc Main Document Page 66 of 95

Case 24-23530 Doc 29 Filed 09/23/24 Entered 09/23/24 09:10:14 Desc Main Document Page 4 of 4

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Robert A. Faucher
Partner
Phone 208.383.3941
Fax 208.343.8869
rfaucher@hollandhart.com

October 2, 2024

VIA INTERNET EMAIL [bundylm.lb@gmail.com; bundylmlb@gmail.com]

Next Day Priority Mail USPS Service

Lisa Bundy
P.O. 1062
Cedar City, UT 84721

UPS Overnight Courier Service

Lisa Bundy
896 E 400 S
New Harmony, UT 84657

Re: In re Ammon Edward Bundy
Case No. 24-23530, United States Bankruptcy Court, District of Utah

Dear Mrs. Bundy:

As you know, you were served with a subpoena on September 24, 2024. The subpoena pertains to a document production due by you on October 10, 2024 and a deposition on October 15, 2024 in Salt Lake City.

I have tried to serve an amended subpoena on you in person, but the process server tells me that has been difficult.

Accordingly, I'm now serving a second amended subpoena on you by overnight mail to the Cedar City post office box, overnight UPS to your house, and e-mail.

The second amended subpoena is enclosed. Like the original subpoena, the second amended subpoena demands production of documents and your appearance for a deposition. However, the second amended subpoena postpones the production of documents to October 17, and postpones the deposition to October 22. Also, the deposition will now go forward in St. George, Utah, not Salt Lake City.

With respect to the production of documents, you can produce those by mailing them to me or e-mailing them to me. There is no requirement that you appear in Salt Lake City.

Location
800 W. Main Street, Suite 1750
Boise, ID 83702-7714

Mailing Address
P.O. Box 2527
Boise, ID 83701-2527

Contact
p: 208.342.5000 | f: 208.343.8869
www.hollandhart.com

October 2, 2024
Page 2

Please call or write if you have any questions. Thank you.

Very truly yours,



Robert A. Faucher
Partner
of Holland & Hart LLP

Enclosure

cc: Ammon Bundy (by Internet e-mail (aebundy@bundyfarms.com; aebundy@msn.com)
Erik F. Stidham, Esq.

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From: Robert Faucher
Sent: Thursday, October 17, 2024 11:50 AM
To: bundylmlb@gmail.com; bundylm.lb@gmail.com
Cc: A Bundy; aebundy@msn.com; Erik Stidham
Subject: Lisa Bundy Rule 2004 Examination
Attachments: 2024-10-02 Second Amended Subpoena for Rule 2004 Examination of Lisa Bundy.pdf; 2024-10-07 Lisa Bundy's Motion to Quash St Luke's Plaintiffs' Subpoena for Lisa Bundy (rec'd by email).pdf

Mrs. Bundy,

As you know, I served a subpoena upon you. I've attached it again for your reference.

Today is the day for you to produce documents. Please confirm you are producing documents. Please let me know how you intend to produce them. Please let me know if I can assist.

Your oral examination is set for Monday, October 21 in St. George. I would appreciate the courtesy of you confirming that you intend to appear. I will be in St. George for that deposition, along with a court reporter and videographer.

I acknowledge that my office has previously received a "Motion to Quash Subpoena for Lisa M. Bundy." I've attached that motion for your reference. However, that motion has never been filed with the Court. Also, it was unsigned. Accordingly, I don't consider it to be relevant to your examination, with the exception identified in the next paragraph.

In your motion, you discuss the burden the proposed discovery places upon you. If you or Mr. Bundy wish to discuss with me ways by which we can better balance (1) my clients' rights to obtain discovery with (2) your desire to reduce the toll upon you, I'm happy to commence those discussions. Just let me know by e-mail or by telephone.

Thanks.



Bob Faucher
Partner

HOLLAND & HART LLP

800 W. Main Street, Suite 1750, Boise, ID 83702

rfaucher@hollandhart.com | T: (208) 383-3941 | M: (208) 283-6781 | F: (208) 343-8869

CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this email.

B2540 (Form 2540 – Subpoena for Rule 2004 Examination) (12/15)

UNITED STATES BANKRUPTCY COURT

District of Utah

In re Ammon Edward Bundy
Debtor

Case No. 24-23530

Chapter 7

SECOND AMENDED SUBPOENA FOR RULE 2004 EXAMINATION

To: Lisa Bundy

(Name of person to whom the subpoena is directed)

☒ **Testimony:** **YOU ARE COMMANDED** to appear at the time, date, and place set forth below to testify at an examination under Rule 2004, Federal Rules of Bankruptcy Procedure. A copy of the court order authorizing the examination is attached.

PLACE

1819 S 120 E
St. George, UT 84790

DATE AND TIME

October 21, 2024
9:00 a.m. MDT

The examination will be recorded by this method: by stenographic means and audio-visual recording.
produce

☒ **Production:** You, or your representatives, must also bring with you to the examination the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

See Exhibits A, A.1 & A.2. Your production is due by October 17, 2024 at Holland & Hart LLP,
222 S. Main St., Ste. 2200 Salt Lake City, UT 84101.

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: ~~September 25, 2024~~ October 2, 2024

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, email address, and telephone number of the attorney representing (name of party)
St. Luke's Health System, Ltd., who issues or requests this subpoena, are:

Robert A. Faucher, Holland & Hart LLP, 800 W. Main St., Ste. 1750, Boise, ID 83702 (208) 342-5000
rfaucher@hollandhart.com, Attorneys for St. Luke's Health System, Ltd.

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

B2540 (Form 2540 – Subpoena for Rule 2004 Examination) (Page 2)

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)*: _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____
_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true and correct.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information concerning attempted service, etc.:

Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)
(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)

(c) Place of compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises, at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense: Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
 - (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
 - (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv) subjects a person to undue burden.
- (B) When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

...

(g) Contempt. The court for the district where compliance is required — and also, after a motion is transferred, the issuing court — may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT A

To Subpoena for Rule 2004 Examination, issued to Lisa Bundy
In Ammon Edward Bundy, Case No. 24-23530, United States Bankruptcy Court, District of Utah

You are obligated to produce the documents identified below, in accordance with the Definitions set forth below, no later than October 15, 2024. You shall produce copies of those documents at the following location:

Holland & Hart LLP
222 South Main Street
Suite 2200
Salt Lake City, UT 84101

Or, you may deliver the documents to that location and make them available for copying by the parties who issued the subpoena. Or, you may deliver the documents in electronic form to:

efstidham@hollandhart.com and
rfaucher@hollandhart.com

You shall identify, with respect to all of the produced Documents, the paragraph number of the request(s) below to which such Document is responsive.

The parties issuing this Subpoena are already in possession of the Already-Obtained Statements. You need not produce them.

DEFINITIONS

“Abish-husbondi” means Abish-husbondi Inc., a Wyoming corporation now known as Kekoa Grove, Inc.

“Already-Obtained Statements” means those bank account statements and credit union account statements identified at Exhibit A.1 hereto.

“Bankruptcy Case” means *In re Ammon Edward Bundy*, Case No. 24-23530, United States District Court, District of Utah.

“Books” means Documents consisting of books and records of a business enterprise, including without limitation, articles of organization, articles of incorporation, by-laws, meeting minutes, stock transfer ledgers, stock certificates or other evidence of equity ownership, indemnification agreements and shareholders’ agreements.

“Bundys” means You and Ammon Edward Bundy.

“Cash Transfers” means those cash deposits Ammon Bundy made into Abish-husbondi bank accounts or credit union accounts as follows:

Date	Amount
August 14, 2020	\$69,000.00
August 19, 2020	\$26,600.00
December 14, 2020	\$50,000.00
February 26, 2021	\$49,800.00
May 17, 2021	\$40,000.00
August 10, 2021	\$ 9,980.00
August 18, 2021	\$59,800.00
September 17, 2021	\$50,000.00
May 31, 2023	\$14,800.00
October 12, 2023	\$17,500.00

“Chambers Transfer” means a transfer of money in the approximate amount of \$487,167.36 from the law offices of Harris, Preston & Chambers to the MA Account.

“Document” or “Documents” shall mean the original, all copies and drafts of papers and writings and data of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, texts, voice messages, instant messages, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, telegrams, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, lab books, lab notes, lab journals or notebooks, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, deeds, mortgages, deeds of trust, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, trust, releases of claims, charters, certificates, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. “Documents” shall include “Electronically Stored Information” as defined herein. “Documents” shall include all of the foregoing transmitted through, or stored in, without limitation, the Signal messaging service. “Documents” shall mean all of the foregoing Documents in Your custody or control.

“Electronically Stored Information” means information made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Electronically Stored Information shall include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones,

Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

“Estopped Certificate” means that Estopped [sic] Certificate, Release & Waiver attached to this subpoena as Exhibit A.2.

“Financial Account Statements” means Documents, including account statements and correspondence, with respect to any financial accounts, including without limitation bank accounts, credit union accounts, securities accounts, credit card accounts, commodities accounts, retirement accounts, 401(k) accounts, Roth accounts, IRA accounts and investment accounts, including all attachments to such statements (such as copies of checks); provided, however, that the term does not include the Already-Obtained Statements.

“Financial Records” means Documents consisting of Financial Account Statements, financial records and software of a business enterprise, whether or not incorporated, including without limitation account and other ledgers, bookkeeping data, accounting data, QuickBooks, etc.

“Former Residence” means that real property in Gem County, Idaho with a street address of 4615 Harvest Lane, Emmett, ID 83617.

“Idaho Litigation” means that lawsuit styled *St. Luke's Health System, Ltd., et al. v. Ammon Bundy, et al.*, Case No. CV-01-22-06789, Fourth Judicial District Court, State of Idaho, County of Ada.

“Judgment” means, collectively, the following court filings in the Idaho Litigation: (i) Default Judgment entered August 29, 2023; (ii) Order on Verdict and Default Judgment entered August 29, 2023.

“PRN” means People’s Rights Network, an unincorporated association with which You have been affiliated.

“Schedules” means the schedule of assets, schedule of liabilities and other schedules filed at docket nos. 5 and 19 in the Bankruptcy Case.

“Statements” means Your statement of financial affairs and other statements filed at docket no. 5 in the Bankruptcy Case.

“You” means Lisa Bundy, your agents, attorneys, employees, representatives, investigators, consultants and attorneys, and “Your” is the possessive form of You.

Documents You are Obligated to Produce

1. All Books of You from January 1, 2020-present.
2. All Financial Records of You from January 1, 2020-present.

3. All Financial Account Statements of You from January 1, 2020-present other than the Already-Obtained Statements.
4. All Documents relating to or evidencing assets in your possession or ownership at any date subsequent to January 1, 2020 of a value exceeding \$500, whether those assets consist of financial accounts (e.g., bank accounts, credit union accounts, securities accounts, commodity accounts, insurance accounts, etc.), financial assets, notes, bonds, stock certificates, equity interests, jewelry, motor vehicles, equipment, household goods, cash, claims, real property, or any other kind of asset, whether tangible or intangible. Notwithstanding the foregoing, you need not produce any documents relating to your Former Residence.
5. All Documents relating to or evidencing assets conveyed to You or by You subsequent to January 1, 2020 of a value exceeding \$500, whether those assets consist of financial accounts (e.g., bank accounts, credit union accounts, securities accounts, commodity accounts, insurance accounts, etc.), financial assets, notes, bonds, jewelry, motor vehicles, equipment, household goods, cash, claims, real property, or any other kind of asset, whether tangible or intangible. Notwithstanding the foregoing, you need not produce any documents relating to your Former Residence.
6. Your personal federal tax returns and schedules for the years 2020-present
7. Your personal state tax returns and schedules for the years 2020-present.
8. Your most recently filed federal income tax return.
9. Your most recently filed state income tax return.
10. All tax forms statements issued to you on and after January 1, 2020, such as IRS Form 1099, IRS Form W-2, and IRS Schedule K-1.
11. All Documents pertaining to the Cash Transfers and the transactions that gave rise to them, other than Already-Obtained Statements, including without limitation agreements, receipts, or invoices.
12. All Documents pertaining to any transfers of value of more than \$500 from Bundys to any other person from the period January 1, 2022-present.
13. Documents consisting of any trust agreements pertaining to any trust as to which You are or have been since January 1, 2020, a grantor, trustee, or beneficiary.
14. All Documents evidencing or relating to Your interest in any real property which you now own or have owned since January 1, 2000.
15. All Documents relating to the Estopped Certificate.

16. All Documents relevant to all transactions in which You or Ammon Bundy has engaged to hinder, delay or impair the St. Luke's Parties' efforts to collect on or enforce the Judgment, including without limitation the Chambers Transfer but not including Documents pertaining to the Former Residence.
17. All Documents in Your possession or control relating to (1) websites operated by PRN or associated with PRN's activities, and (2) websites affiliated with St. Luke's Exposed or St. Luke's exposed.
18. All Documents exchanged between the Bundys and Jane Valenzuela, an Arizona resident, and all documents pertaining to the transactions between Valenzuela and any the Bundys.
19. All Documents pertaining to any asset in which You have any beneficial interest but in the possession or control or ownership of another person, including without limitation any asset which You believe should be returned to You or Ammon Bundy at some point in the future.
20. All Documents evidencing or pertaining to any property you inherited since January 1, 2020.
21. Any Documents in Your possession evidencing an inaccuracy in the Schedules or the Statements.

EXHIBIT A.1

Already Obtained Statements

CLARITY CREDIT UNION ACCOUNT STATEMENTS		
Account Holder	Account Number	Dates
Abish-Husbondi	***1572	Aug 31, 2020 - March 31, 2024
Ammon Bundy - Ammon Bundy for Governor	***2161	May 31, 2021 - Feb 28, 2023
Bowen Bundy (Lisa Bundy joint holder)	***2128	May 31, 2021 - March 31, 2024
Dono Custos INC	***1719	Oct 31, 2020 - March 31, 2024
Farm Inc Bundy	***1571	Aug 31, 2020 - Jan 31, 2023
Hayden Bundy	***2127	May 31, 2021 - March 31, 2024
Lisa Bundy	***1616	Sep 30, 2020 - March 31, 2024

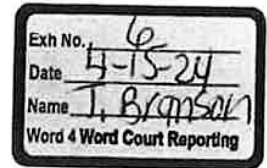
EXHIBIT A.1 TO SUBPOENA - 1

WELLS FARGO BANK ACCOUNT
STATEMENTS

Account Holder	Account Number	Dates
Abish Husbondi Inc	*****4772	Aug 30, 2019 – Dec 31, 2020
Abish Husbondi Inc	*****7284	Aug 31, 2019 - Oct 31, 2020
Abish Husbondi Inc	*****4778	Aug 31, 2019 – Dec 31, 2020
Ammon Bundy	*****4297	Oct 17, 2018 - Jan 16, 2020
Bundy Farm Inc AKA Bundy Melons	*****7835	Feb 29, 2020 – Dec 31, 2020
Halle Bundy	*****2035	Feb 29, 2020
Halle Bundy	*****7147	Feb 28, 2020 - Sep 28, 2020
Lisa Bundy	*****0547	Oct 22, 2018 - Sep 30, 2020
Lisa Bundy	*****9358	Oct 22, 2018 - Sep 30, 2020
Valet Fleet Services, LLC	*****6948	June 30, 2019 – Sep 30, 2023
Valet Fleet Services, LLC	*****6955	Jan 1, 2018 – May 31, 2019

32863387 v1

EXHIBIT A.1 TO SUBPOENA - 2



**ESTOPPED CERTIFICATE,
RELEASE & WAIVER**

Recitals

Global Trading & Investments, Inc., an Idaho corporation ("GT&I") is in possession of certain funds belonging to Ammon E. and Lisa M. Bundy (collectively "Bundy"). GT&I and its principals desire to distribute the funds to Bundy (or to such party or parties as Bundy directs) and upon distributions be released of any further liability with regards to said funds.

Estoppel, Release & Waiver

NOWHEREFORE, for good and valuable consideration, and GT&I's reliance on Bundy's execution of this instrument, the parties to this agreement represent and agree to the following:

A. Waiver of Accounting. Bundy waives any further accounting of the funds. Upon receipt of the signed release GT&I shall cause to be disbursed to Abish-husband, Inc., the sum of \$487,167.36 (\$507,167.36473,000 less \$20,000.00).

B. Full & Complete Distribution. Except for the \$20,000 fee the distribution represents a full and complete satisfaction of Bundy's interest in the funds and GT&I's obligation to Bundy.

C. Release. Bundy releases and forever discharges GT&I, their officers, directors, shareholders, agents, attorneys, accountants and/or other representatives, from all actions, claims and demands whatsoever including but not limited to any claim(s) relating to the Loan Servicing and Stock Investment Arrangements, and any other act, matter, cause, or thing whatsoever arising out of the aforesaid transactions or the administration of such funds received from Bundy. *Bundy understands that they have the right to obtain advice concerning this instrument from independent legal counsel of their choice, at their cost, and represents that they have either done so prior to executing this instrument or have knowingly elected voluntarily to waive any such right at this time.*

D. Estoppel Certificate. Bundy understands and agrees that by executing this instrument that GT&I and its agents are relying on the Bundy's representation in this instrument in making the distribution as directed by Bundy, instead of interpleading the funds into a court to obtain court approval. Bundy understands and agrees that if they sign this instrument, they will be forever estopped from challenging this instrument in any fashion

E. Indemnification. Bundy agrees to indemnify and hold harmless (from Bundy's own assets) GT&I, its officers, directors, shareholders, agents, attorneys, accountants and/or other representatives against any cost or expense (including counsel



**Mountain America Credit Union
Account Number Specification Sheet
Wire Instructions**

ID: 50

Description: Business Checking

This specification sheet is for the following credit union member(s):

ABISH HUSBONDI INC
3061 RIVERSIDE ROAD
MESQUITE, 89027

ABA Routing Number: 324079555

Account Number: 501013664849

Wire Instructions:

***Please note Mountain America Credit Union does not have a "Swiftcode." We do not handle exchange of foreign currency. The originating bank should have a corresponding bank in the United States they use to send wires through for this purpose. They will then forward to Mountain America Credit Union's routing number and the member's account number.**

Incoming wire fee: \$10.00

If you have further questions regarding these instructions, please contact the Mountain America Credit Union Service Center at 1-800-748-4302.

This order is SIGNED.

Dated: September 23, 2024

William T. Thurman

**WILLIAM T. THURMAN
U.S. Bankruptcy Judge**



msc

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(Admitted *Pro Hac Vice*)
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*Attorneys for St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd.,
Chris Roth, Natasha Erickson, M.D., and Tracy Jungman, NP*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In re:	Bankruptcy No. 24-23530
AMMON EDWARD BUNDY,	Chapter 7
Debtor.	Honorable William T. Thurman

**ORDER GRANTING ST. LUKE'S PARTIES' MOTION PURSUANT TO
FED.R.BANKR.PRO. 2004 FOR AN ORDER AUTHORIZING AN EXAMINATION
OF, AND PRODUCTION OF DOCUMENTS BY, LISA BUNDY**

The Court having reviewed and considered The St. Luke's Parties' Motion Pursuant to Fed. R. Bankr. Pro. 2004 for an Order Authorizing an Examination of, and Production of Documents by, Lisa Bundy filed on September 20, 2024 (the "Motion"); and

Good cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd. Chris Roth, Natasha Erickson and Tracy Jungman, or any of them, are authorized to issue subpoenas to Lisa Bundy (1) for production of documents by her with at least 14 days' prior written notice; and (2) for an oral examination of her with at least 14 days' prior written notice.

----- End of Document -----

DESIGNATION OF PARTIES TO BE SERVED

Service for the foregoing Order shall be served to the parties and in the manner designated below:

By Electronic Service: I certify that the parties of record in this case as identified below are registered CM/ECF users and will be served notice of entry of the foregoing Order through the CM/ECF system.

Mark C. Rose
McKay, Burton & Thurman, P.C.

trustee@mbt-law.com

U.S. Trustee

USTPRegion19.SK.ECF@usdoj.gov

Darren G. Reid
Engels Tejada
Benjamin D. Passey
Erik F. Stidham
Robert A. Faucher
Holland & Hart LLP

dgreid@hollandhart.com
ejtejeda@hollandhart.com
bdpassey@hollandhart.com
efstidham@hollandhart.com
rfaucher@hollandhart.com

By U.S. Mail / Electronic Mail: In addition to the parties of record receiving notice through the CM/ECF system, the following parties should be served Notice pursuant to Fed. R. Civ. P. 5(b).

By U.S. First Class Mail – postage prepaid:

Ammon Edward Bundy, *pro se*
P.O. Box 1062
Cedar City, UT 84721

Ammon Edward Bundy
896 E 400 S
New Harmony, UT 84757

Dated: September __, 2024.

Case 24-23530 Doc 180 Filed 11/07/24 Entered 11/07/24 16:35:50 Desc Main Document Page 86 of 95

Case 24-23530 Doc 29 Filed 09/23/24 Entered 09/23/24 09:10:14 Desc Main Document Page 4 of 4

32813091_v1

Lisa M. Bundy
P.O. Box 1062
Cedar City, Utah
84720-1062

**UNITED STATES BANKRUPTCY COURT,
DISTRICT OF UTAH**

Ammon Edward Bundy

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(
(
(

Case No: 24-23530
Chapter 7
WILLIAM T. THURMAN

MOTION TO QUASH SUBPOENA FOR LISA M. BUNDY

Comes now Lisa Bundy to move this court to quash the subpoena served by St. Luke's parties upon Lisa Bundy.

BACKGROUND

St. Luke's sued Mr. Bundy, he never appeared in the case and eventually a \$53 million default judgment was issued against him. To find relief from the relentless aggression of St. Luke's attorneys litigating against him with 6 teams of attorney in 5 states and in 9 separate courts Mr. Bundy filed bankruptcy in July of 2024. St. Luke Health System has spent over a million dollars litigating against Mr. Bundy. Lawfare is the term. To cause further suffering to the Bundy family, St. Luke's attorneys recently filed for permission to subpoena Mrs. Bundy in this bankruptcy case. This court recently authorized them to serve papers upon Mrs. Bundy for a subpoena. St. Luke attorneys want to get Mrs. Bundy in their office alone, to gang up and tear her down in hopes that she will say something that they can use against her husband. They know that Mr. and Mrs. Bundy have no means to practically hire an attorney. How would they pay the attorney? St Luke's attorneys know that they have seized the Bundy's bank accounts and funds.

Furthermore, Mrs. Bundy is a stay-at-home mother that cares for her family deeply. It is a low blow by the St. Luke's council to shamelessly involve her in this attack. Attacking women and children during conflict is something only dishonorable men do.

ARGUMENT TO QUASH SUBPOENA FOR LISA BUNDY

The Subpoena is unauthorized pursuant to FRCP 45

(c) Place of Compliance.

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(iii)

Mrs. Bundy resides in New Harmony, Utah, nearly 4 hours away from the location of the set examination, approximately 270 miles from her residence. A far cry from the 100-mile circumference required by the federal rules. Additionally, Mrs. Bundy is not party to the bankruptcy nor a party's officer. The subpoena is not for a trial and it would cause Mrs. Bundy substantial hardship in expenses and otherwise which will be explained further. For these reasons the subpoena for Lisa Bundy should be quashed.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

The St. Luke's attorneys have not taken reasonable steps to avoid imposing undue burden and expenses on Mrs. Bundy. St. Luke's council (Holland & Hart) expects Mrs. Bundy to pay for fuel, hotel, meals and other traveling expenses, driving over 540 miles. The trip would surely consist of 2 days after the drive up and the examination. St. Luke's council, shamelessly issued Mrs. Bundy a black and white check for \$251.26. Mrs. Bundy is offended that St. Luke's attorney would issue a check in the first place. The last thing she wants is a little bit of money back that was stolen from her family in the first place. That said, what good is a check to Mrs. or Mr. Bundy? The St. Luke's attorneys know that they have seized all of the Bundy's bank accounts and that they cannot cash the check, even if they wanted to. It's like stealing out of a Canadian beggars pan, transferring the money to Mexican currency and then giving a little bit of it back to the beggar. What is the beggar supposed to do with it? How does it help him at all?

The Holland and Hart attorneys (St. Luke's council) are very much aware that Mrs. Bundy has no means of cashing a check. In fact, the black and white check was copy of a Mountain America Credit Union check. The same institution where Mrs. Bundy banked for over 25 years until her account was seized. The same credit union that St. Luke's team of attorneys recently subpoenaed in this court. The last time Mrs. Bundy tried to cash a check there, they looked up her account, saw that it was seized for some legal reason and told her that they could not help her. Mrs. Bundy left in tears wondering how she was going to buy groceries. The St. Luke's attorneys know that Mrs. Bundy has no way of cashing a check and that the place of examination would cause extreme burden upon the Bundy family, these attorneys are in violation of FRCP 45(d)(1).

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

St. Luke's council has not shown any substantial need for Lisa Bundy to be examined. They have not shown that an interrogation of Mrs. Bundy would result in more than a bunch of "I don't knows". Mrs. Bundy is not party in this case, nor in the lawsuit that resulted in the \$53,000,000.00 judgment against her husband. Mrs. Bundy is not an officer to any party and she had nothing to do with any of the finances in any entity that Mr. Bundy controlled or was part of. The St. Luke's attorneys, at best, are assuming that Mrs. Bundy knows more than the household finances. If they wanted to know how much the Bundy family spent on groceries or how much the children's clothing cost in a year then Mrs. Bundy may have the answers. But questions about finances or transaction outside the household scope, Mrs. Bundy simply will not know and the St. Luke's attorneys have not shown any substantial need to interrogating Mrs. Bundy. Therefore, the court should quash the subpoena.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in [Rule 45\(c\)](#);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

Mrs. Bundy's expenses to travel across the State of Utah would be an extreme burden upon her and her children. As mentioned, Mrs. Bundy is a stay-at-home mother that transports her children approximately 30 miles to and from school. There are no bus transportations available for her younger children. The burden upon her and her family would be significant.

Furthermore, and most important; Mrs. Bundy has not stopped fretting and crying since the St. Luke's Parties served her with the subpoena. Because of the harassment and aggression of the St. Luke's council her life has been extremely disrupted for nearly three years now. Mrs. Bundy is not emotionally capable of being examined by the same people that have so viciously attacked her family for so long. In fact, Mrs. Bundy is not emotionally capable of being examined by any aggressor at this time. The emotion of being examined will be too burdensome upon her.

It was the hopes of the Bundy family that once they moved out of Idaho, left their home and community that St. Luke's executives and attorneys would be satisfied and leave them alone allowing them to rebuild, but instead they have pursued them with even more vigor. Even after taking title of their home, seizing their bank accounts and taking all the shares in Mr. Bundy's enterprises, the St. Luke's executives and attorneys are not content. Now, they are directly seeking to adversely interrogate Mrs. Bundy face to face for information that Mrs. Bundy has little or no knowledge of. This is harassment, causing further suffering to the Bundy family. Mrs. Bundy is not emotionally capable to endure such interrogations, the burden upon her is too much and therefore the court should quash the subpoena and order that no other subpoena be served upon Lisa Bundy in this case.

If the court chooses to order a professional evaluation of Mr. Bundy's emotional condition, then there are not objections as long as it is within close proximity of her residence and with a professional of her approval.

DATED THIS DAY, the 7th of October, 2024.

Lisa Bundy

| CERTIFICATE OF SERVICE

I certify that on this day I served a copy of the attached to:

UNITED STATES BANKRUPTCY COURT, DISTRICT OF UTAH

350 S Main St, Salt Lake City, UT 84101

[X] USPS Mail

Mark C. Rose, Trustee

mrose@mbt-law.com

[X] Email

Erik Stidham



efstidham@hollandhart.com

[X] Email

DATED THIS DAY, the 7th of October, 2024.

Lisa Bundy

 Search Facebook





Lisa Bundy
October 1 at 12:46 PM · 🌐

I wake everyday hoping to be saved. I hurry to my phone to maybe see that I received a message saying..."you have been delivered"...that "God has finally showed his hand...and you are delivered". The peace and life you've always wanted is now your next chapter.

Yet. I sit here another day. Not delivered.

Harassment continues. Peace is not in the cards.

For there is no "Ammon Bundy" to care enough to do the right thing for US. Is there nobody else that cares enough to do the right thing. To stand in the gap of corruption. There is not.

My husband gave his all to multiple people. With my support. That were delivered!!! Yet, we sit here with no help. It is because he did what he did that puts us in this misery. Yet, would he do it again? Probably.

I've now been subpoenaed to testify for the very wicked people we seek deliverance from. In a bankruptcy case...have you even heard of such a thing.

There is no savior for us. Not even do I feel the saviors warm embrace that deliverance is nigh.

It is a wicked world.

I'm tired.

Don't mistake my smile for immense pain I hide deep in my soul.

 107

80 comments 4 shares

 Like

 Share

<https://www.facebook.com/lisa.sundloffbundy/posts/pfbid0etdmSkCYgDYcNkxyd6S5aUqL9b9vRTDQFCrbE8WeQszaH9z7xqpfc74bq3geeMZQl>

From: Robert Faucher
Sent: Monday, October 21, 2024 8:55 AM
To: bundylm.lb@gmail.com; bundylmlb@gmail.com
Cc: A Bundy; aebundy@msn.com
Subject: This morning's oral examination

Good morning Mrs. Bundy,

I'm awaiting your appearance at the Hyatt Place in St. George for your oral examination, which is noticed for this morning. You are not here, and the examination is scheduled to start in five minutes. Please confirm you will be attending.

Thank you.



**Holland
& Hart**

Bob Faucher
Partner

HOLLAND & HART LLP

800 W. Main Street, Suite 1750, Boise, ID 83702

rfaucher@hollandhart.com | **T:** (208) 383-3941 | **M:** (208) 283-6781 | **F:** (208) 343-8869

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